

**Federal Defenders  
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July 31, 2019

**By ECF**

Honorable Cathy Seibel  
United States District Judge  
Southern District of New York  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

**Re: United States v. Raheem Vilar**  
**96 Cr. 551 (CLB); 16 Civ. 5283 (CS)**

Dear Judge Seibel:

The parties write to update the Court following the Supreme Court's decision in United States v. Davis, 139 S. Ct. 2319 (2019). The parties are discussing the possibility of a negotiated disposition to Mr. Vilar's pending 28 U.S.C. § 2255 motion. In the event that the parties are unable to reach agreement, we respectfully propose the following briefing schedule:

- Vilar's Brief: August 23, 2019
- Government's Brief: September 20, 2019
- Vilar's Reply Brief: September 27, 2019

Respectfully submitted,

/s/ Daniel Habib, Esq.  
Assistant Federal Defender  
Tel.: (212) 417-8769

CC: Government counsel (by ECF)